

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY PRODUCTS  
LIABILITY LITIGATION

MDL No. 3047

Case No. 4:22-md-03047-YGR (PHK)

This Document Relates To:

Judge: Hon. Yvonne Gonzalez Rogers

*The School Board of Hillsborough County, Florida  
v. Meta Platforms, Inc., et al.*, No. 24-cv-01573

*Board of Education of Jordan School District v.  
Meta Platforms, Inc., et al.*, No. 24-cv-01377

*Tucson Unified School District v. Meta Platforms,  
Inc., et al.*, No. 24-cv-01382

**DECLARATION OF JOSEPH  
SANDOVAL-BUSHUR IN SUPPORT  
OF DEFENDANTS' REPLY IN  
SUPPORT OF DEFENDANTS'  
MOTION TO PRECLUDE  
PLAINTIFFS FROM RELYING ON  
LATE-DISCLOSED SCHOOL  
DISTRICT WITNESSES**

I, Joseph Sandoval-Bushur, declare and state as follows:

1. I am an attorney admitted to practice in the District of Columbia and State of Missouri, and admitted to practice *pro hac vice* in the above-entitled action. I am associated with the law firm Williams & Connolly LLP, counsel for Defendant YouTube, LLC, Google LLC, and Alphabet Inc. I make this declaration in support of Defendants' Reply in Support of Defendants' Motion to Preclude Plaintiffs from Relying on Late-Disclosed School District Witnesses. This declaration is based on my own personal knowledge and, if called to testify as to the truth of the matters set forth herein, I could and would competently testify thereto. I offer this declaration without waiving or intent to waive attorney-client privilege.

2. Attached as Exhibit N is a true and correct copy of the Declaration of Bailey J. Langner in Support of Defendants' Motion to Preclude Plaintiffs from Relying on Late-Disclosed School District Witnesses, signed on May 30, 2025.

3. Attached as Exhibit O is a true and correct copy of email correspondence between TaCara Harris, Michael M. Weinkowitz, and Bailey J. Langner, dated April 11, 2025 through April 15, 2025.

Case No. 4:22-MD-03047-YGR

DECLARATION IN SUPPORT OF DEFENDANTS' REPLY IN SUPORT OF DEFENDANTS' MOTION TO  
PRECLUDE PLAINTIFFS FROM RELYING ON LATE-DISCLOSED SCHOOL DISTRICT WITNESSES

5. Attached as Exhibit Q is a true and correct copy of email correspondence between Bailey J. Langner and Austin Brane, dated April 18, 2025 through May 23, 2025, with redactions required under Fed. R. Civ. P. 5.2(a)(3).

By: /s/ Joseph Sandoval-Bushur  
Joseph Sandoval-Bushur